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HAZARDOUS WASTE CONTAINER STORAGE AREA CLOSURE PLAN FOR

BLACKHAWK DIVISION
BELOIT CORPORATION
1165 PRAIRE HILL ROAD
ROCKTON, ILLINOIS 61072

AUGUST 8, 1986

Introduction

The following plan was prepared for final closure of the hazardous waste container storage area at the Blackhawk Division of Beloit Corporation. This plan has been developed in accordance with applicable requirements of the State of Illinois Environmental Protection Agency. The storage area will be closed in a manner which will protect human health and the environment.

Description of Facility

The Beloit Corporation Blackhawk Division is located in Rockton, Illinois. This facility manufactures machinery for wet end paper making. This facility is covered under Standard Industrial Code (SIC) 3554. This facility has not obtained a Part A Permit.

Description of Container Storage Area

The container storage area covered by this closure plan is a concrete vault. The interior dimensions of this free-standing vault are six feet wide, twelve feet ten inches long and three foot ten inches high. Wall thickness is 5.5 inches with an additional 1.5 inch flange on the top edge. A concrete floor seals off the vault interior. A 4000 pound concrete lid requires removal by crane. A recent inspection indicated that there are no visible cracks or faults in the side walls or floor. The accumulation of rain water in the vault when the lid is not replaced indicates that the interior is water tight.

This vault was used as a container storage area for a period of approximately seven months. Only full steel 55 gallons DOT drums, containing waste lacquer thinner were stored in the vault. These bung type drums were stored closed at all times.

Facility Map

The location of the Blackhawk facility is shown on a topographic map (Figure 1). Figure 2 presents a detailed drawing of the facility. A plan view of the Container Storage Area is shown in Figure 3.

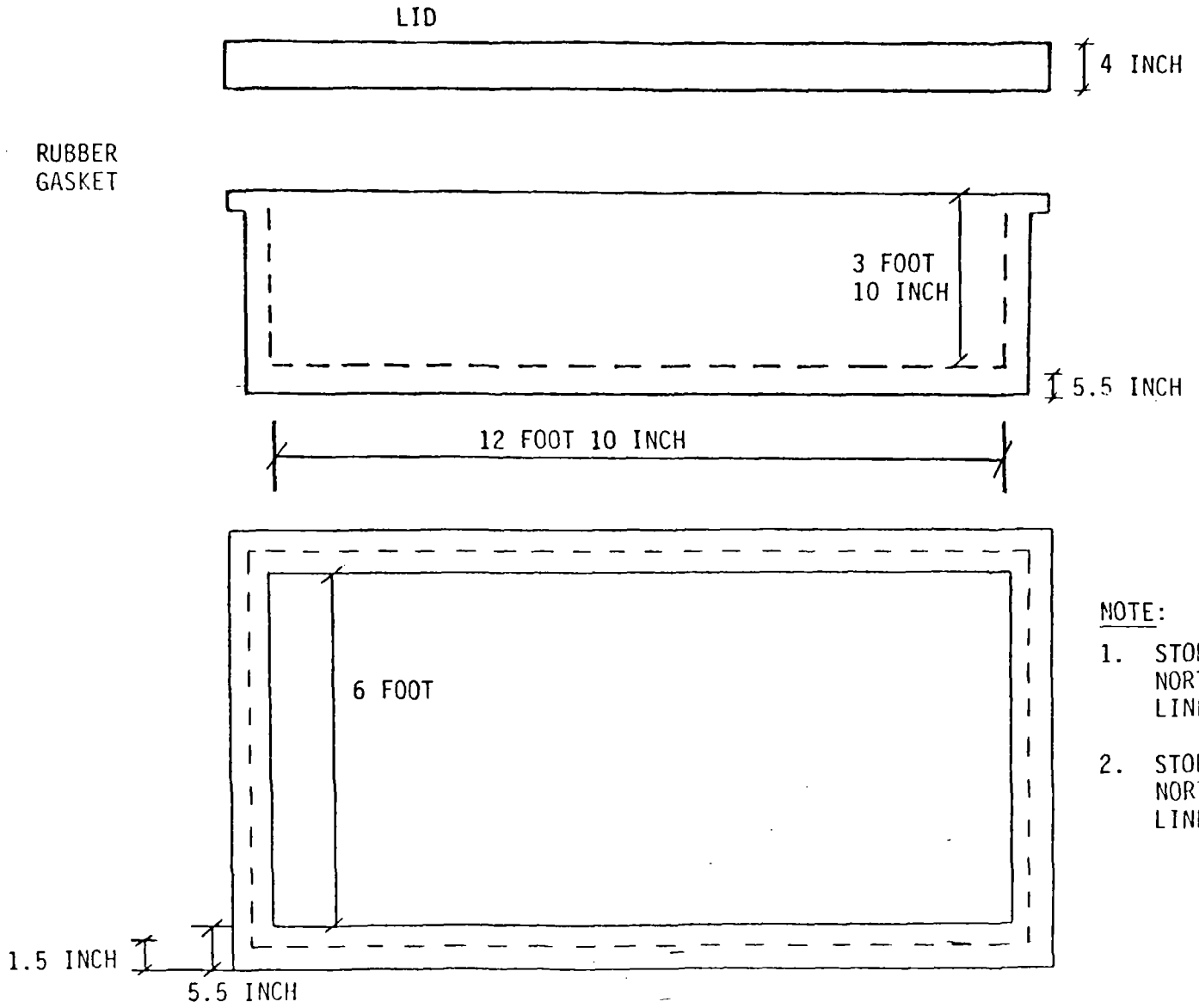

FIGURE 3. CONTAINER STORAGE AREA PLAN VIEW

Hazardous Waste

The Container Storage Area was used to store 55 gallon steel drums containing waste lacquer thinner. This material exhibits the hazardous waste characteristic of ignitability (D001). It can also be classified as waste flammable liquid, n.o.s. UN1993. Table 1 presents a complete Waste Profile analysis, including results of an EP Toxicity test for the waste lacquer thinner. The maximum volume of material stored at any one time was 20 full drums. The waste was generated through cleaning of paint spray guns and paint brushes.

TABLE 1. MATERIAL WASTE PROFILE

Sample obtained June 27, 1986

Parameter	Concentration
pH	5.90 pH units
Specific Weight	0.82 gm/cc
Total Solids	6.78 %
Phenol	0.5 ug/gm
Flashpoint	72°F
Sulfide	0.14 ug/gm
Total Cyanide	<0.05 ug/gm
Free Cyanide	<0.025 ug/gm

EP Tox	Concentration, mg/l
Silver	<0.001
Arsenic	<0.01
Barium	<0.01
Cadmium	0.002
Chromium	<0.001
Lead	0.44
Mercury	<0.001
Selenium	<0.001

Schedule for Closure

All hazardous waste onsite at the Blackhawk facility prior to approval of this plan will be removed for proper disposal as part of the storage area closure. This will be accomplished within 90 days after approval of this plan by IEPA. All closure activities will be completed within 180 days after approval of this plan.

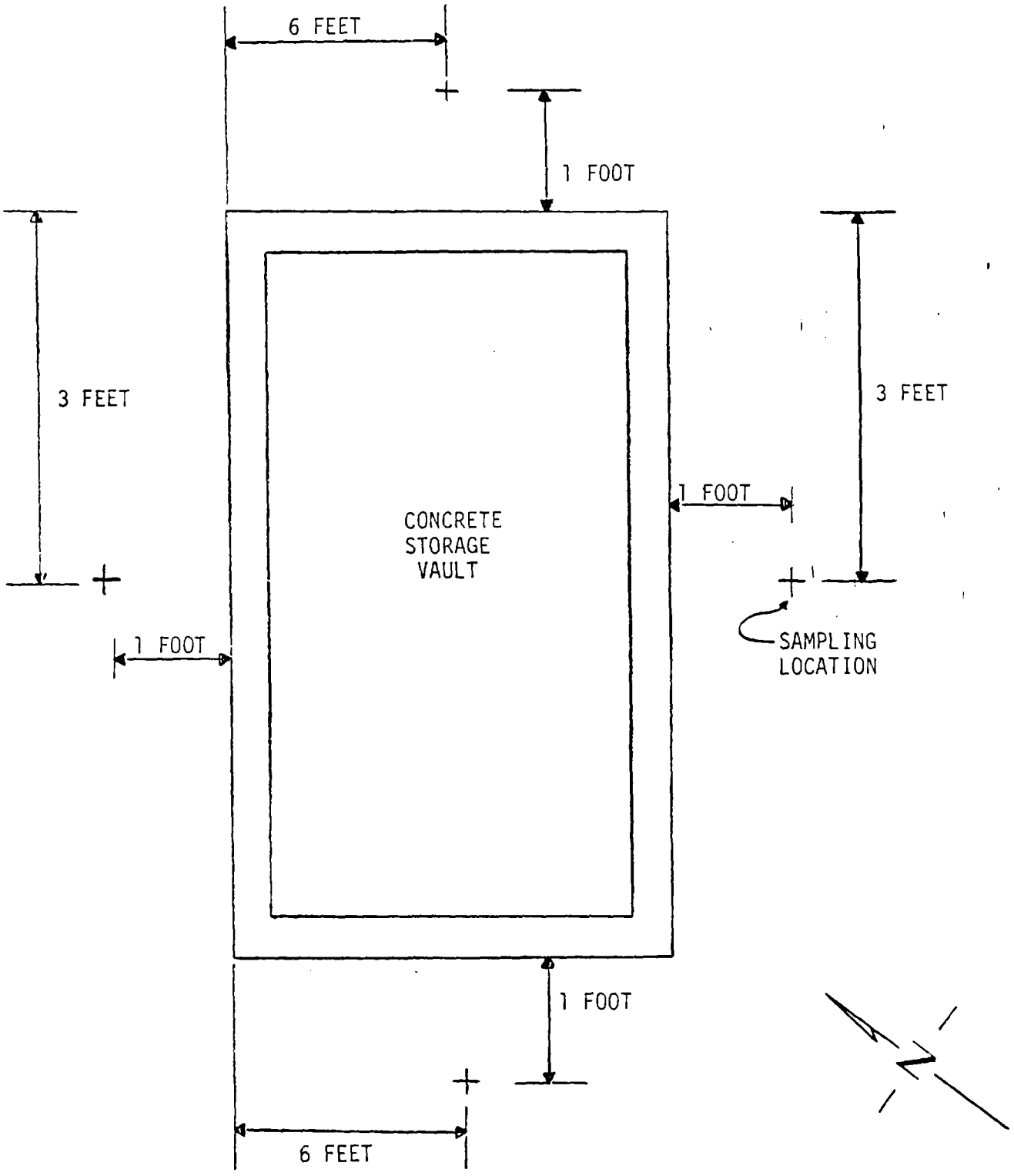

FIGURE 4. SOIL SAMPLING PROGRAM LOCATIONS

Table 2 presents a timetable for the major events of this closure plan. Unless otherwise stated, the Time to Completion column indicates days after plan approval.

TABLE 2. CLOSURE PLAN TIMETABLE

Event	Time to Completion
Obtain hazardous waste determination of waste lacquer thinner	Completed
Removal and disposal of all hazardous waste onsite at a licensed disposal facility	September 15, 1986
IEPA Approval of Closure Plan	0
Site inspection and closure certification by Beloit Corporation and Professional Engineer	30

Closure Plan Details

This closure plan consists essentially of the following components:

1) Obtain hazardous waste determination of waste lacquer thinner.
2) Identify a licensed disposal facility that will accept this waste.
3) Properly label all full, or partially full, drums containing waste lacquer thinner.
4) Arrange for shipment of all full drums by a licensed transporter to the selected disposal facility.
5) Removal of stored containers and storage area decontamination.
6) Conduct soil sampling program.
7) Site inspection and closure certification.
8) Implementation of a waste tracking program to assure that hazardous waste is not stored longer than 180 days at the Blackhawk facility.

The relatively short time period the concrete vault was used as a container storage area and the fact that all containers kept in the vault were always sealed makes closure of this storage area straight forward.

A hazardous waste determination has confirmed that the waste lacquer thinner exhibits the characteristics of an ignitable hazardous waste (D001). Beloit Corporation has contacted a licensed disposal facility, Milwaukee Solvents (WID 023350192) and arranged for recycling of the waste lacquer thinner. Any residue produced during recycling will be incinerated by Milwaukee Solvents. Milwaukee Solvents, also holding a hazardous waste transporter license under the same ID number, WID 023350192, will transport the drummed containers to their facility.

A maximum of twenty 55 gallon drums will require disposal initially. Each drum will be properly labelled and the shipment will be manifested. Removal of these full containers may be accomplished before IEPA approval of this closure plan. Subsequent full drums containing waste lacquer thinner will be properly disposed of within the required time period after the accumulation start date.

The storage vault will be decontaminated by a three step program, after removal of all drums. The first step will be to remove and drum any accumulated stormwater and/or spilled material. A hazardous waste determination will be made on any material collected. Ultimate disposal will depend on the determination results. The second step will consist of hand scrubbing the vault interior using an alkaline detergent solution. A two man crew, wearing protective boots and gloves and face shields, will thoroughly clean the concrete walls and floor. All wash water produced will be drummed and analyzed to determine disposal options. A final step consists of rinsing the vault interior with tap water. Any rinsate produced will be collected and analyzed to determine disposal options.

Decontamination of equipment used to transfer full drums from the vault to Milwaukee Solvent's vehicle will not be necessary unless container leakage occurs during transfer.

If a material spill occurs during drum transfer, spill response steps will immediately be implemented. These consist of containment and cleanup of any spill using absorbent materials. Any spilled material will be considered a flammable liquid and all appropriate fire prevention precautions will be taken. Beloit Corporation personnel involved in spill cleanup will wear protective gloves and boots and face shields. All materials used in spill cleanup will be drummed and handled as a hazardous waste. Any equipment contaminated by a spill will be thoroughly flushed with water. All flush waters will also be drummed and held until a hazardous waste determination can be obtained.

A soil sampling program will be used to confirm that a release of hazardous material to the environment has not occurred over the period of use of the concrete vault. The four sampling locations are shown in Figure 4. Soil core samples will be taken at each location using a thin wall tube sampler. Cores will be obtained to a two foot depth. Two samples will be taken from each core: one sample of the top 6 inches and a second sample of the bottom 6 inches. A Waste Profile analysis (Table 1) indicated that this waste material contains measureable quantities of phenol. Detectable levels of phenol will not be present in soil surrounding the storage vault unless a release has occurred. Therefore, the soil sampling program will use a phenol concentration of 0.1 mg/kg to indicate soil contamination. Soil samples containing less than this level will be considered "clean."

Any areas of contaminated soil identified in the sampling program will be excavated to a depth of 2 feet and up to 3 feet away from the vault sidewall. This material will undergo a hazardous waste determination to indicate disposal options. Excavated areas will be resampled (2 foot depth) and tested. The incremental sampling and removal will continue in areas indicating contamination up to a depth of 4 feet. If evidence of contamination is present at this point, Beloit Corporation will discuss additional closure procedures with IEPA. One potential procedure would be the implementation of a contingent closure plan consisting of permanently securing any remaining contamination. The excavation would be filled with bentonite clay and compacted. Any excavation not indicating residual contamination will be backfilled will clean sand.

Closure Certification

A site inspection and submittal of a closure certification statement by Beloit Corporation and a Professional Engineer, registered in the State of Illinois, is required to complete closure of the concrete vault storage area. This statement will be submitted within 30 days of approval of this plan.

A Closure Documentation Report will accompany the certification to document the closure activities. This report will include:

- the volume of waste removed
- a description of the method of waste handling and transport
- the waste manifest number from waste shipment(s)
- a chronological summary of closure activities and the costs involved

Facility Status After Closure

The Blackhawk Division of Beloit Corporation normally falls under Small Quantity Generator Category. After closure is completed, this facility can be operated as an SQG (less-than-180-day storage, store less than 1000 kg at any one time). No treatment or disposal of hazardous waste will occur at this facility. Blackhawk will not generate more than 1000 kg/month of hazardous waste.